

In re: Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 3:18-MD-02843-VC*TIMELINE OF DEPOSITION ISSUES RELATED TO PLAINTIFFS' MARCH 1, 2022 30(b)(6) DEPOSITION NOTICE**

Date	Description
Dec. 23, 2021	Plaintiffs serve a draft 30(b)(6) notice for discussion purposes, ask to meet and confer regarding any issues Facebook has. Facebook does not respond. ECF No. 1007-4, Weaver Decl., ¶ 6. The draft notice comprises 9 topics for testimony.
Mar. 1, 2022	Plaintiffs serve Plaintiffs' Second Amended Notice of Deposition of Defendant Facebook, Inc. Pursuant to Federal Rule of Civil Procedure 30(b)(6) ("30(b)(6) Notice"). Weaver Decl., ¶ 6. The only difference from the December 23 draft notice is the addition of one topic; the 30(b)(6) Notice comprises 10 topics for testimony.
Mar. 29, 2022	Facebook serves its responses and objections to Plaintiffs' 30(b)(6) Notice. ECF No. 988-5, Ko Decl., ¶ 4.
Mar. 30, 2022	The parties meet and confer regarding Facebook's responses and objections. Facebook characterizes the objections as "really nothing" and "boilerplate." It identifies no substantive objections. Ko Decl., ¶¶ 4, 7.
May 5, 2022	Plaintiffs depose Facebook designee Allison Hendrix on 30(b)(6) Notice topics 1, 2, and 3. Counsel instructs the designee not to answer questions that are beyond the scope of the topics noticed, engages in extended speaking objections, and further improperly impedes Plaintiffs' ability to procure testimony. ECF No. 1005-3 (transcript); ECF No. 935 (May 6 expedited sanctions motion).
May 6, 2022	Plaintiffs file Plaintiffs' Motion for Expedited Relief and Sanctions for Deposition Conduct ("May 6 expedited sanctions motion"). ECF No. 935.
May 9, 2022	Plaintiffs commence deposition of Facebook designee Simon Cross on 30(b)(6) Notice topics 2, 6, 7, and 8. ECF No. 1001-7 (full transcript).
May 12, 2022	Plaintiffs continue deposition of Facebook designee Simon Cross on 30(b)(6) Notice topics 2, 6, 7, and 8.
May 17, 2022	The Special Master enters Stipulation and Order Regarding Plaintiffs' Motion for Expedited Relief and Sanctions for Deposition Conduct ("May 17 Stipulation and Order"). The Order grants the relief Plaintiffs sought in the May 6 expedited sanctions motion. ECF No. 936. Facebook also agrees to extend the amount of time Plaintiffs will be able to take depositions on the topics in the 30(b)(6) Notice from 21 hours to 100 hours.
May 18, 2022	Plaintiffs commence deposition of Facebook designee Mike Clark on 30(b)(6) Notice topic 4. ECF No. 1001-6 (full transcript).
May 19, 2022	Plaintiffs commence deposition of Facebook designee Amy Lee on 30(b)(6) Notice topic 10.
June 3, 2022	Pursuant to the May 17 Stipulation and Order, Plaintiffs re-depose Facebook designee Allison Hendrix on 30(b)(6) Notice topics 1, 2, and 3. <i>See</i> ECF No. 936 (order).
June 6, 2022	Plaintiffs continue deposition of Facebook designee Simon Cross on 30(b)(6) Notice topics 2, 6, 7, and 8.

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Date	Description
June 20, 2022	Plaintiffs continue deposition of Facebook designee Simon Cross on 30(b)(6) Notice topics 2, 6, 7, and 8.
June 29, 2022	Pursuant to the parties' agreement, Plaintiffs provide additional questions for which they seek additional testimony, some written, some oral, from Simon Cross on topics 2, 6, 7, and 8. <i>See</i> ECF No. 1043-3.
June 30, 2022	Plaintiffs depose Facebook designee Mayur Patel on 30(b)(6) Notice topic 4.
July 2, 2022	Facebook identifies which of the 143 additional questions on 30(b)(6) Notice topics 2, 6, 7, and 8 identified by Plaintiffs on June 29 it will (and will not) respond to. <i>See</i> ECF No. 1043-3.
July 13, 2022	Facebook provides written responses to 57 of the 143 additional questions on 30(b)(6) Notice topics 2, 6, 7, and 8 identified in Plaintiffs' June 29 submission. <i>See</i> ECF No. 1043-3.
July 15, 2022	The parties file submissions regarding whether Facebook should be required to answer the additional questions identified in Plaintiffs' June 29 submission on 30(b)(6) notice topics 2, 6, 7, and 8 that Facebook refused to answer. <i>See</i> ECF No. 1043-3.
July 20, 2022	Plaintiffs depose Facebook designee Chris Casorio on the topic of data brokers as implicated by numerous topics in the 30(b)(6) Notice.
July 21, 2022	Plaintiffs depose Facebook designee Michael Fahey on 30(b)(6) Notice topic 9.
July 21, 2022	Plaintiffs commence deposition of Facebook designee Steven Elia on 30(b)(6) Notice topic 9.
July 22, 2022	Plaintiffs continue deposition of Facebook designee Steven Elia on 30(b)(6) Notice topic 9.
July 22, 2022	Plaintiffs depose Facebook designee David Miller on 30(b)(6) Notice topic 9.
Aug. 5, 2022	Plaintiffs depose Facebook designee Isabella Leone on the topic of targeted advertising as implicated by numerous topics in the 30(b)(6) Notice. ECF No. 1001-5 (full transcript).
Aug. 8, 2022	The Special Master issues the Order Regarding Facebook's Objections to 30(b)(6) Written Questions, ordering Facebook to provide written responses to all but a few of the questions posed in Plaintiffs' June 29 submission. <i>See</i> ECF No. 1043-3.
Aug. 15, 2022	Plaintiffs depose Facebook designee Harrison Fisk on 30(b)(6) Notice topic 5.